



STATEMENT OF BASIS
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BAQ Air Permitting Division

| | | | |
|-----------------------|--|-----------------------|-------------------------|
| Company Name: | SCE&G – Parr Combustion Turbine Facility | Permit Writer: | Kathleen T. Haddock, PE |
| Permit Number: | TV-1000-0021 | Date: | DRAFT |

DATE APPLICATION RECEIVED: November 29, 2016; corrected pages received August 10, 2017.

DATE OF LAST INSPECTION: November 2, 2017 – Comprehensive Inspection: No violations

FACILITY DESCRIPTION: This facility operates four combustion turbines for power generation that are operated only during periods of high electricity demand, i.e. peak shaving units. The facility operates two emergency generators (ENG-2 and ENG-3) subject to 40 CFR 60, Subpart IIII and 40 CFR 63, Subpart ZZZZ, considered Insignificant Activities. The facility operates a distillate fuel oil storage tank, also considered an Insignificant Activity.

PROJECT DESCRIPTION: This project is for the renewal of the facility's Title V operating permit.

CHANGES SINCE LAST OP ISSUANCE: The current Title V operating permit was effective on October 1, 2012. The following revision were issued: Administrative Amendment on December 13, 2012 to correct an insignificant activity source description; Administrative Amendment on January 22, 2014 to change the environmental contact; and a Minor Modification on March 8, 2016 to add a black start diesel generator to the Insignificant Activities List.

| FACILITY WIDE EMISSIONS | | |
|--|------------------------|------------------------------|
| Pollutant | Uncontrolled Emissions | Controlled/Limited Emissions |
| | TPY | TPY |
| PM/PM ₁₀ /PM _{2.5} | 53.1 | 53.1 |
| SO ₂ | 15.0 | 15.0 |
| NO _x | 3,892 | 3,892 |
| CO | 362.7 | 362.7 |
| VOC | 9.29 | 9.29 |
| Pb | 0.0619 | 0.0619 |
| CO _{2e} | 723,648 | 723,648 |
| 1,3 – Butadiene | 0.071 | 0.071 |
| Acetaldehyde | 0.18 | 0.18 |
| Acrolein | 0.028 | 0.028 |
| Arsenic | 0.049 | 0.049 |
| Benzene | 0.24 | 0.24 |
| Beryllium | 0.0014 | 0.0014 |
| Cadmium | 0.021 | 0.021 |
| Chromium | 0.049 | 0.049 |
| Ethylbenzene | 0.14 | 0.14 |
| Formaldehyde | 3.1 | 3.1 |
| Lead | 0.062 | 0.062 |
| Manganese | 3.5 | 3.5 |
| Mercury | 0.0053 | 0.0053 |
| Naphthalene | 0.15 | 0.15 |
| Nickel | 0.020 | 0.020 |
| POM | 0.18 | 0.18 |



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| FACILITY WIDE EMISSIONS | | |
|-------------------------|------------------------|------------------------------|
| Pollutant | Uncontrolled Emissions | Controlled/Limited Emissions |
| | TPY | TPY |
| Propylene Oxide | 0.13 | 0.13 |
| Selenium | 0.11 | 0.11 |
| Toluene | 0.57 | 0.57 |
| Xylenes | 0.28 | 0.28 |
| Total HAP | 8.9 | 8.9 |

OPERATING PERMIT STATUS

This facility operates under Title V Operating Permit issued on July 3, 2012 with an effective of October 1, 2012. The permit expired on September 30, 2017. The facility submitted an application for renewal on November 29, 2016. In accordance with SC Regulation 61-62.70.5 (a)(1)(iii), the facility is granted an application shield.

| REGULATORY APPLICABILITY REVIEW | | | |
|---------------------------------|---|------------------|--|
| Regulations | Comments/Periodic Monitoring Requirements | | |
| Section II.E – Synthetic Minor | Not Applicable: The facility has not taken any synthetic minor limits. | | |
| Standard No. 1 | Not Applicable: The turbines are not fuel combustion sources as defined under this standard. | | |
| Standard No. 3 (state only) | Not Applicable: The facility does not combust any waste. | | |
| Standard No. 4 | Applicable: The visible emissions limit of 40% opacity is applicable to the turbines. The turbines were installed in 1969 and have not been modified. | | |
| Standard No. 5 | Not Applicable: Although the facility was in existence pre-1979/1980, the facility does not have the PTE to emit VOC over 100 TPY and none of the subparts apply to the facility. | | |
| Standard No. 5.2 | Not Applicable: The turbines were installed prior to the applicability date of June 25, 2004 and none of the burner assemblies have been replaced. The standard condition pertaining to pre-2004 burner assemblies is included in the renewal. The emergency generators are exempt from the standard in accordance with Section I (B)(2). | | |
| Standard No. 7 | Not Applicable: The facility is a major source for SO ₂ , NO _x , and CO but has not undergone any major modifications that have triggered PSD applicability. | | |
| 61-62.6 | Applicable: The facility is subject to the state-wide requirements for fugitive particulate matter emissions as stated in condition M.4 in the General Facility Wide section of the permit. | | |
| 40 CFR 60 and 61-62.60 | Subpart | Emission Unit(s) | Applicability Determination |
| | Kb - Volatile Organic Liquid Storage Vessels for Which Construction, | IA-ST-1 | Not Applicable in accordance with §60.110b(b). The volume of the tank is 892,231 gallons (3377 |



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| REGULATORY APPLICABILITY REVIEW | | | |
|---------------------------------|---|------------------|--|
| Regulations | Comments/Periodic Monitoring Requirements | | |
| | Reconstruction, or Modification Commenced After July 23, 1984 | | m ³) but the material stored (distillate fuel oil) has a vapor pressure of less than 3.5 kPa. |
| | GG – Stationary Gas Turbines | CT1 through 4 | Not Applicable in accordance with 60.330(b). The rated heat input of each turbine is greater than the 10 MMBtu/hr applicability threshold, but the turbines were installed prior to October 3, 1977 (1969 and 1970) and have not been modified or reconstructed. |
| | III – Stationary Compression Ignition IC Engines | CT1 through 4 | Not applicable by definition |
| | III – Stationary Compression Ignition IC Engines | ENG-2 and ENG-3 | Applicable in accordance with §60.4200(a). |
| | JJJ – Stationary Spark Ignition IC Engines | NA | The facility does not operate any spark ignition IC engines. |
| | KKKK – Stationary Combustion Turbines | CT1 through 4 | Not Applicable in accordance with §§60.4300 and 60.4305. Although the four combustion turbines are rated at greater than 10 MMBtu/hr, they were installed prior to February 18, 2005 and have not been modified or reconstructed. |
| 40 CFR 61 and 61-62.61 | Not Applicable: The facility does not operate any of the processes regulated. | | |
| 40 CFR 63 and 61-62.63 | Subpart | Emission Unit(s) | Applicability Determination |
| | YYYY – Stationary Combustion Turbines | CT1 through 4 | Not Applicable in accordance with §63.6085 as the facility is not a major source of HAP. |
| | ZZZZ – Stationary RICE | ENG-2 and ENG-3 | Applicable in accordance with §63.6585(c). The facility will demonstrate compliance with the MACT by demonstrating compliance with 40 CFR 60, |



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REGULATORY APPLICABILITY REVIEW

| Regulations | Comments/Periodic Monitoring Requirements | | |
|------------------------|---|--|---|
| | | | Subpart IIII as allowed in §63.6590 (c)(1). |
| 61-62.68 | Not Applicable: The facility stores only diesel fuel (Tank IA-ST-1) which is not a regulated pollutant under 112(r). | | |
| 40 CFR 64 (CAM) | Not Applicable: The facility does not operate any control devices. | | |
| 61-62.96 and 40 CFR 96 | Not Applicable: The NO _x and SO ₂ Budget Trading Program is not applicable to the facility. Although the facility operates four combustion turbines and produces electricity for sale, the turbines serve a generator with a capacity of less than 25 MWe. In accordance with §§96.4(a) and 96.204(a)(1), the regulation is not applicable. | | |
| 61-62.99 | Not Applicable: The NO _x Budget Program Requirements for Stationary Sources not in the Trading Program is not applicable as the facility does not operate a kiln. | | |

AMBIENT AIR STANDARDS REVIEW

| Regulations | Comments/Periodic Monitoring Requirements |
|-----------------------------|--|
| Standard No. 2 | Applicable: See modeling summary dated March 2, 2012. There have been no changes to the facility requiring updated modeling. |
| Standard No. 7.c | Not Applicable: MSBDs have not been established for Fairfield County. |
| Standard No. 8 (state only) | Not Applicable: In accordance with Section I of the standard, TAP from the burning of virgin fuel is not required. |

PUBLIC NOTICE

This Title V Permit will undergo a 30-day public notice period and a 45-day EPA comment period in accordance with SC Regulation 61-62.1, Section II.N and SC Regulation 61-62.70.7(h). The comment period was open from June 7, 2018 to July 6, 2018 and was placed on the BAQ website during that time period.

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.